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**MEMO ENDORSED**

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**August 11, 2021**

**VIA ECF**

Hon. Kenneth M. Karas, USDJ  
300 Quarropas Street, Chambers 533  
White Plains, NY 10601-4150

**Re:** The ProImmune Company, LLC v Holista Colltech Ltd. et al.  
**Docket No.:** 7:20-cv-1247 (KMK)  
**Subject:** APPLICATION TO APPROVE SEALED FILING AND  
PUBLICLY FILE REDACTED FILING

Dear Judge Karas,

The undersigned is the attorney for defendant-counterclaim plaintiff Holista Colltech Ltd (“Defendant” or “Holista”). The letter motion seeks an Order formally approving the sealing of ECF Doc. No. 73 (Response to Plaintiff’s Rule 56.1 Statement) that contained sensitive business information, which plaintiff ProImmune Company, LLC (“ProImmune”) had sought to seal with prior Court approval.

By way of background, ProImmune filed a letter motion on June 8, 2021 (ECF Doc. 42) that proposed “that *both parties* redact the specific information in the evidence submitted, as well as the briefing for their respective summary judgment motions, supporting declarations, and *Local Rule 56.1 separate statements.*” (*Emphasis added.*) The Court granted this motion.

Next, as part of the opposition briefing, on July 30, 2021, when the undersigned filed Holista's Response to Plaintiff's Rule 56.1 Statement (ECF Doc. No. 73), I inadvertently uploaded to ECF the unredacted version of the document, which contained sensitive information that should have been redacted. When I was made aware of this by opposing counsel earlier today, I called the Clerk of the Court who immediately sealed the document and instructed me to file the instant letter motion seeking formal court approval to keep ECF Doc. No. 73 under seal.

Accordingly, the instant motion is being filed to formally obtain a sealing order allowing ECF Doc. No. 73 to remain as a sealed filing as well as permission to publicly file a redacted version of ECF Doc. 73.

Very truly yours,

**TURTURRO LAW, P.C.**

/s/Natraj S. Bhushan

To (via ECF): Ryan Abbot & Rowenakete P. Barnes

Granted.  
8/12/21

SO ORDERED  
  
KENNETH M. KARAS U.S.D.J.